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 CITY OF ANTIOCH

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

21 SANTEYA DANYELL WILLIAMS,  
 22 MARY RUTH SCOTT, KAREN  
 23 LATREECE COLEMAN, PRISCILLA  
 BUNTON, and ALYCE DENISE PAYNE,  
 on behalf of themselves and all others  
 24 similarly situated,

25 Plaintiffs,

26 v.

27 CITY OF ANTIOCH,

28 Defendant.

No. C-08-2301 SBA (EDL)

**STIPULATION AND ORDER  
 MODIFYING DISCOVERY DATES**

1           The parties hereby stipulate to a modest modification of the class certification  
2 discovery deadlines in this case. This request does not change the deadline for filing and hearing  
3 of Plaintiffs' motion for class certification.

4           Discovery commenced in this class action after the Case Management Conference  
5 held on October 2, 2008. Since that time the parties have exchanged initial disclosures and  
6 initial written discovery, produced thousands of pages of documents and electronic data,  
7 negotiated document preservation and protective orders. In addition, Plaintiffs have taken a  
8 deposition pursuant to Fed. R. Civil Pro 30(b)(6), served subpoenas, obtained documents from  
9 the Housing Authority of Contra Costa County and have filed and won a motion to compel  
10 further production from it.

11           The parties have cooperated in discovery, but it has become apparent that, due to  
12 the substantial amount of electronic data and emails involved, and the necessity of pre-disclosure  
13 document review by Defendant, the current discovery cut off of May 1, 2009, does not allow  
14 sufficient time for the parties to prepare for a settlement conference, or to complete class  
15 certification discovery. The parties have agreed to the following modification of the discovery  
16 dates, which is contingent upon Defendant completing production of documents and  
17 supplementing its response to Plaintiffs' First Request for Production of Documents and  
18 providing a privilege log by March 20, 2009. Since class certification dates are unchanged, this  
19 modification will not delay this action:

	<b>Current</b>	<b>Proposed</b>
Discovery Cut Off	May 1, 2009	June 15, 2009
Plaintiff Expert Report	May 15, 2009	June 15, 2009
Defendant Expert	June 15, 2009	August 3, 2009
Rebuttal Expert	July 15, 2009	September 1, 2009

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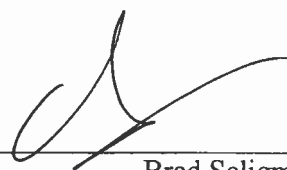
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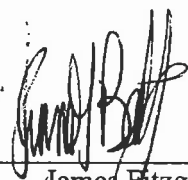
	Current	Proposed
Class Cert. Motion	September 15, 2009	Unchanged
Class Cert. Opposition	October 6, 2009	Unchanged
Class Cert. Reply	October 13, 2009 <sup>1</sup>	

2 The settlement conference date with Magistrate Judge Larson has been changed  
3 from March 24, 2009 to June 12, 2009.

4  
5 DATED: March 9, 2009

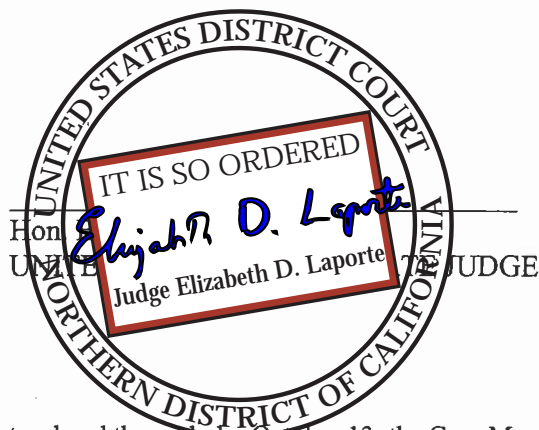
6  
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9 By:   
10 Brad Seligman  
11 Attorneys for Plaintiffs and the Proposed Class

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13  
14  
15 DATED: March 9, 2009

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17  
18 By:   
19 James Fitzgerald  
20 Attorneys for Defendant

21 IT IS SO ORDERED.

22  
23 DATED: March 10, 2009



<sup>1</sup> At the Case Management Conference, the Court ordered the reply by October 13; the Case Management Conference Minutes erroneously transposed this date to October 31, 2009.